

ESTTA Tracking number: **ESTTA533925**

Filing date: **04/23/2013**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91210238
Party	Plaintiff The Cincinnati Reds LLC
Correspondence Address	Lisa M. Willis Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES trademark@cll.com, jmn@cll.com, lmw@cll.com, kco@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Lisa M. Willis
Filer's e-mail	trademark@cll.com, jmn@cll.com, lmw@cll.com
Signature	/Lisa M. Willis/
Date	04/23/2013
Attachments	LOVE RED - 4.23.13 Motion to Suspend.pdf ( 3 pages )(10679 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 85/540,275  
Filed: February 11, 2012  
For Mark: LOVE RED  
Published in the Official Gazette: October 16, 2012

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THE CINCINNATI REDS LLC,	:	
Opposer,	:	Opposition No. 91210238
	:	
v.	:	
	:	
CORNBORN, LLC,	:	
Applicant.	:	
-----	X	

**MOTION ON CONSENT TO SUSPEND PROCEEDINGS  
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order suspending the proceedings in this matter for a period of three (3) months, until **July 23, 2013**. Applicant's counsel consented to this motion, which is requested to allow the parties to engage in settlement discussions.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, the Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition until thirty (30) days after the suspension ends. Additionally, the parties request that six months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceedings resume so that the parties will have the full

period of discovery in the event that the matter is not able to be resolved. The trial periods and other periods should be reset accordingly.

Dated: New York, New York  
April 23, 2013

COWAN LIEBOWITZ & LATMAN, P.C.  
Attorneys for Opposer

By: /Lisa M. Willis/  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on April 23, 2013, I caused a true and correct copy of the foregoing Motion to Suspend to be sent via First Class Mail, postage prepaid, to Applicant and Correspondent of Record, CornBorn, LLC, 218 Shadow Valley Bend, Dakota Dunes, South Dakota 57049; Attn: Randy Farwell.

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/Lisa M. Willis/

Lisa M. Willis